

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

HAMED WARDAK,
Plaintiff,

v.

SARAH GOOLDEN,
Defendant.

No. 1:24-cv-24198 (FAM)

**MOTION FOR LEAVE TO FILE RESPONSE IN OPPOSITION
TO MOTION DISMISS OUT OF TIME BY ONE-DAY**

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Attorneys for Plaintiffs

Defendant, Sarah Goolden (“Defendant”), by and through the undersigned counsel, hereby seeks entry of an order from this Honorable Court allowing it to file out of time (by one day) a response in opposition to the Motion to Dismiss [D.E. 18] (“Motion to Dismiss”) filed by the Plaintiff Hamed Wardak (collectively, “Defendants”).

The Motion to Dismiss was filed on December 20, 2024 and the docket text stated responses due by 1/3/2025.

The Opposition [D.E. 18] was prepared and uploaded to the ECF system by Defendant’s counsel on 01/03/2025, Defendant’s counsel was called away in the midst of filing to pick up a prescription for his wife, and inadvertently failed to complete the filing.

WHEREFORE, Defendant, Sarah Goolden (“Defendant”), by and through the undersigned counsel, respectfully requests that this Honorable Court enter an order extending the time for Plaintiffs to file their Opposition to the Motion to Dismiss through the end of day, January 4, 2025, and deem the already filed Opposition to the Motion to Dismiss [D.E. 19] timely, and for any other relief this Court deems just and proper.

DATED: January 4, 2025

Respectfully submitted,

/s/ Robert D. Garson
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